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10 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
13 SOUTHERN DIVISION

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 ONE 2023 LAND ROVER RANGE  
18 ROVER SUV, MISCELLANEOUS  
LAND ROVER RANGE ROVER  
19 VEHICLE ACCESSORIES, ONE  
DIAMOND RING, 1.5 MILLION  
20 SHARES OF SUNDANCE  
STRATEGIES, INC. STOCK AND  
21 \$15,000.00 HELD AS A SECURITY  
DEPOSIT,

22 Defendants.  
23

Case No. 8:23-CV-02113

**VERIFIED COMPLAINT FOR  
FORFEITURE**

18 U.S.C. § 981(a)(1)(A) and (C)

[F.B.I.]

24  
25  
26 Plaintiff United States of America brings this claim against defendants One 2023  
27 Land Rover Range Rover SUV, Miscellaneous Land Rover Range Rover Vehicle  
28 Accessories, One Diamond Ring, 1.5 Million Shares of Sundance Strategies, Inc. stock

1 and \$15,000.00 Held as a Security Deposit (collectively, the “Defendant Property”), and  
2 alleges as follows:

3 JURISDICTION AND VENUE

4 1. This is a civil forfeiture action brought pursuant to 18 U.S.C. § 981(a)(1)(A)  
5 and (C).

6 2. This Court has jurisdiction over the matter under 28 U.S.C. §§ 1345 and  
7 1355.

8 3. Venue lies in this district pursuant to 28 U.S.C. § 1395.

9 PERSONS AND ENTITIES

10 4. The plaintiff in this action is the United States of America.

11 5. The Defendant Property was seized during the execution of federal Search  
12 and Seizure warrants on June 1, 2023, at the following locations:

13 a. The defendant 2023 Land Rover Range Rover was seized from  
14 Benny Mor, dba Vasco Assets (“Mor”), with VIN SALK1BE79PA011048 and having  
15 Tradability, LLC as the vehicle’s registered owner, at Mor’s residence in Irvine,  
16 California.

17 b. The defendant Diamond Ring and the defendant Miscellaneous Land  
18 Rover Range Rover Vehicle Accessories were seized from Jasmine Bruce (“Bruce”) at  
19 her residence in Laguna Niguel, California.

20 c. The defendant 1.5 Million Shares of Sundance Strategies, Inc. stock  
21 was seized from Charles Schwab & Co., Inc in Omaha, Nebraska.

22 d. The defendant \$15,000.00 held as a security deposit was seized from  
23 Parisian Management Inc. in Newport Coast, California.

24 6. The Defendant Property is currently in the custody of the United States  
25 Marshals Service in this District, where it shall remain subject to this Court’s jurisdiction  
26 during the pendency of this action.

27 7. The interests of Mor, Bruce, Tradability, LLC, Parisian Management, Inc,  
28 Victim B.D. and Amadou Diallo (“Diallo”) may be affected by these proceedings.

BASIS FOR FORFEITURE

The Fraudulent Scheme Involving Virtual Advisors and Liquide

8. On May 3, 2023, a federal grand jury sitting in the Central District of California returned an indictment charging Diallo with nineteen counts of wire fraud and two counts of transactional money laundering in connection with an alleged fraudulent scheme whereby Diallo defrauded at least eleven victim-investors out of approximately \$1.8 million used to invest in Diallo's companies, Virtual Advisors and Liquide, between 2015, up through at least January 2020. On September 20, 2023, a first superseding indictment was returned in the case, which charged Diallo with, among other things, one count of violating the Foreign Corrupt Practices Act in relation to the Virtual Advisors and Liquide fraud scheme. See United States v. Amadou Diallo, Case No. 8:23-cr-00054-JWH.

9. To induce victim-investors to invest in his companies, Diallo falsely represented himself to be a self-made millionaire and successful entrepreneur who had become wealthy working in e-commerce, information technology, and other industries. To signal to the victim-investors his success as a businessman, Diallo flaunted his ownership of luxury homes and vehicles, falsely claimed that he owned them debt-free, and at times falsely claimed to be one of the richest men in Africa.

10. In fact, Diallo used the majority of the victim-investors' funds on personal expenses, including rent payments on his luxury home; luxury vehicles, including payments for two Rolls-Royces and a Ferrari; clothing and other personal shopping and dining; fitness club memberships and spas; and Amazon.com purchases. Additionally, unbeknownst to the victim-investors, Diallo used victim-investor funds to lavishly host and entertain foreign government officials from Senegal.

11. Throughout the scheme, victim-investors of Virtual Advisors and Liquide communicated with Diallo via in-person meetings, email, text message, and WhatsApp. Diallo also hosted potential victim-investors at the luxury homes he lived in when soliciting them to invest in his companies.

1           12. According to bank account records for the accounts used by Diallo in the  
2 Virtual Advisors and Liquide fraudulent schemes, the last deposits of victim-investor  
3 funds into those accounts occurred in or around September 2019. After the deposits of  
4 victim-investor funds into those accounts stopped, the account balances dropped below  
5 zero before the accounts were closed in or around October 2019. Diallo continued  
6 placating his victim-investors until in or around January 2020.

7           13. In September 2020, Federal Bureau of Investigation (the “FBI”) agents  
8 interviewed Diallo regarding the Virtual Advisors and Liquide schemes. In June 2021,  
9 FBI agents served Diallo with a target letter informing him that he was the target of a  
10 federal criminal investigation involving allegations of wire fraud.

11 The Fraudulent Scheme Involving Teleinstruction

12           14. In or about January 2021, Diallo began soliciting victim-investors for his  
13 new business, Teleinstruction, which Diallo had incorporated in California in February  
14 2021. Diallo was introduced to a group of physicians who met virtually to discuss  
15 investment opportunities. Diallo described himself in these virtual meetings as a wealthy  
16 tech entrepreneur who was developing a company called Teleinstruction that was similar  
17 to Zoom, but for physicians. The purported goal was for Teleinstruction to function as a  
18 remote medical monitoring service, providing remote access to physicians. The victims  
19 believed the investments they paid to Diallo were for the purchase of shares in  
20 Teleinstruction, as described in Diallo’s purported investment contract.

21           15. According to bank records with respect to the bank accounts Diallo used in  
22 the Teleinstruction fraud scheme, in February and March 2021, two separate victim-  
23 investors wired a total of \$150,000.00 to a Citibank checking account held in the name  
24 of Teleinstruction, LLC, on which Diallo was the sole signatory. Prior to the wire  
25 transfers made by the victim-investors, the account balance was \$16,246.64. After the  
26 wire transfers from the victim-investors were made in March 2021, Diallo initiated a  
27  
28

1 series of withdrawals and Zelle<sup>1</sup> transfers to other bank accounts that Diallo controlled,  
2 leaving the Teleinstruction account with a balance of \$5.00. Diallo spent the majority of  
3 the \$150,000.00 of victim investments on personal expenses and to fund Diallo's lavish  
4 lifestyle.

5 The Fraudulent Scheme Involving Sundance Strategies

6 16. In or about May 2021, Diallo incorporated Tradability, LLC in Wyoming.  
7 Diallo opened multiple bank accounts in the name of "Tradability, LLC," including a  
8 checking account at Citibank (the "Tradability Citi 2923 account"), opened in October  
9 2021 and a Charles Schwab brokerage account (the "Tradability Schwab 552 account"),  
10 opened in February of 2022, and both accounts listed Diallo as the Chief Executive  
11 Officer and the Managing Member of Tradability. Tradability hired one of Diallo's  
12 friends, Jason Woodland ("Woodland") as a paid consultant.

13 17. In or about September of 2021, Woodland introduced Diallo to the  
14 Chairman of Sundance Strategies, Inc. ("Sundance"), a company located in Provo, Utah  
15 that bundles and sells existing life insurance policies to third parties. Diallo claimed to  
16 have been a leading expert at IBM, and to have the ability "with only a few key strokes"  
17 to get an entity to the top of Google search results. Diallo claimed to have access to  
18 IBM's "secret formulas," and that he was a "world expert" who could help Sundance  
19 raise capital for bonds. Ultimately, Diallo offered to raise funds for Sundance by selling  
20 Non-fungible tokens ("NFTs"), backed by existing life insurance policies. Diallo told  
21 Sundance that he could quickly raise \$100 million to \$200 million for Sundance because  
22 demand for NFTs was so high. Diallo said that he was part of an association of investors  
23 and that he personally had the ability to cause his contacts from this association to invest  
24 \$50 million to \$100 million in Sundance with only one telephone call.

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27 <sup>1</sup> Zelle is a United States-based digital payments network run by a private  
28 financial services company called Early Warning Services. The Zelle service enables  
individuals to electronically transfer money from their bank account to another registered  
user's bank account (within the United States) using a mobile device or the website of a  
participating banking institution.

1           18. In or around January 2022, Sundance entered into a marketing and  
2 consulting services contract with Tradability.<sup>2</sup> Sundance paid Diallo \$100,000 for an  
3 advance on services, via wire transfer to Diallo's Tradability Citi 2923 account. Diallo  
4 asked Sundance for an additional \$400,000, so the parties included in their contract  
5 documentation for a loan from Sundance to Tradability in the form of a promissory note.  
6 The note provided for a \$400,000 loan to Tradability once Tradability accomplished  
7 certain milestones outlined in the marketing and consulting services contract related to  
8 Tradability raising funds for Sundance. (However, Diallo/Tradability failed to perform  
9 on the contract, so the loan was never funded). Sundance also committed to issuing  
10 shares of Sundance stock to Tradability upon performance of the agreement by  
11 Tradability. However, Diallo asked Sundance to give Tradability a percentage of the  
12 shares<sup>3</sup> upfront as an incentive to Diallo's team to perform. Diallo claimed this would  
13 accelerate the performance of the contract with Sundance. Sundance agreed and, on or  
14 about March 7, 2022, transferred 1.5 million shares of Sundance stock to Diallo's  
15 Tradability Schwab 552 account (i.e., the defendant 1.5 Million Shares of Sundance  
16 Strategies, Inc. stock).

17           19. In or around February 2022, the Sundance Chairman traveled to Orange  
18 County, California, where Diallo and Woodland took him out to dinner in Laguna  
19 Beach, with Diallo driving an electric Mercedes-Benz that purportedly cost hundreds of  
20 thousands of dollars. Diallo pointed out his home on one of the hills in Laguna Beach  
21 and told the Sundance Chairman that Diallo had Rolls-Royces parked in the garage of  
22 the home.

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24           <sup>2</sup> The contract listed the business address for Tradability as 5000 Birch Street,  
25 Suite 3000, Newport Beach, CA 92660. This is the same address listed on the Articles  
26 of Incorporation for Diallo's other company, Teleinstruction.

27           <sup>3</sup> At the time of transfer to Tradability, Sundance shares were publicly traded on  
28 the Over-the-Counter ("OTC") market under the ticker symbol SUND. OTC securities  
are securities that are not listed on a major exchange in the United States (usually  
because many are smaller companies and do not meet the requirements to be listed on a  
major exchange) and are instead traded via a broker-dealer network. At the time of the  
transfer of shares to Tradability, Sundance shares were trading at \$6.70 per share.

1           20. After Sundance paid Tradability and transferred the shares of Sundance  
2 Stock, Diallo essentially disappeared, and Tradability never developed or sold any NFTs  
3 for Sundance. Diallo placated Sundance by claiming that he was in the process of  
4 purchasing one of the “largest registered investment advisor (‘RIA’) firms in the  
5 country,” claiming that this RIA alone could raise hundreds of millions of dollars per  
6 year and had billions of dollars under management. Diallo insisted his purchase of this  
7 RIA would expedite the Sundance deal coming to fruition because he had personal  
8 discretion over a certain percentage of the RIA’s funds and could direct the RIA agents  
9 and their clients to invest in Sundance.

10           21. In or about March of 2023, Sundance requested that Diallo and Tradability  
11 return the \$100,000 and the 1.5 million shares of Sundance stock due to Tradability  
12 having not performed any of its obligations, but Diallo refused and blamed their  
13 nonperformance on “tough markets,” claiming that Tradability had earned the funds and  
14 the shares with Diallo’s marketing efforts. In about May of 2023, Diallo told Sundance  
15 that the RIA was “working” and would “assimilate the RIA to assist with the Sundance  
16 deal.” Diallo further claimed that he was working on a big deal to purchase a bank, and  
17 that once that deal was completed, Tradability would be able to perform its obligations to  
18 Sundance. Diallo never told Sundance that he was under investigation by the FBI.

19 The Fraudulent Scheme Involving Claraphi Advisory Network and Victim B.D.

20           22. In or about March 2022, Woodland introduced Diallo to victim B.D. Diallo  
21 claimed to be a successful businessman who owned a number of companies and had  
22 relationships with celebrities. Diallo claimed that Tradability was in the process of  
23 acquiring an RIA named “Claraphi,” needed \$4,000,000 to purchase the interest of one  
24 of the major shareholders of Claraphi, and planned to combine multiple companies to  
25 create one large financial services company. To facilitate Tradability’s purchase of  
26 Claraphi shares, B.D. made a short-term “Bridge” loan to Diallo in March 2022, secured  
27 by a convertible promissory note that had a maturity date of six months and guaranteed  
28 ten percent interest.



1           23. When the note matured, Diallo did not repay the loan but opted to take a six  
2 month extension. The six month extension expired in March, 2023, at which time full  
3 repayment of the loan was due. Diallo never repaid the loan and blamed this failure on a  
4 shareholder lawsuit and certain personnel who had defected from Claraphi.

5           24. In fact, Diallo had entered into an agreement in or about March of 2022  
6 with the then owner of financial services company, Pomegranate Holdings, LLC  
7 (“Pomegranate”) to purchase one of its wholly owned subsidiaries, Claraphi Advisory  
8 Network (“Claraphi”). Tradability was to acquire Claraphi for \$3 million dollars. Diallo  
9 made a \$1 million payment to Pomegranate at signing in March, 2022, and per the terms  
10 of the contract, was required to pay the remaining \$2 million in four \$500,000 payments,  
11 plus interest, spread over the course of the next year. To show proof of his ability to  
12 complete the deal with Pomegranate, Diallo provided documentation from the  
13 Tradability Schwab 552 account, reflecting that the Sundance Strategies shares had a  
14 value of over \$10 million. Diallo made the first installment payment of \$506,265.59 to  
15 Pomegranate in June of 2022, but defaulted on the remaining \$1.5 million, plus interest  
16 due on the sale of Claraphi to Tradability. Instead of completing the deal with  
17 Pomegranate, Diallo again spent the majority of victim B.D.’s investment funds on  
18 personal expenses and to maintain his lavish lifestyle.

19           25. Bank account records associated with the accounts used by Diallo in the  
20 scheme perpetrated against Sundance and victim B.D. reflect the following:

21           a. On or about January 6, 2022, the \$100,000 payment from Sundance  
22 was wired into the Tradability Citi 2923 account, related to the agreement between  
23 Sundance and Tradability. The account balance prior to the wire transfer from Sundance  
24 was \$30,494.66. On or about January 11, 2022, Diallo wrote a check from the account  
25 in the amount of \$63,058.62 to Redline Acceptance related to Diallo’s acquisition of a  
26 2022 Mercedes-Benz EQS 450 automobile.

27           b. On or about March 15, 2022, the \$4 million from victim B.D. was  
28 wired into the Tradability Citi 2923 account related to the short-term loan from B.D. to



1 Diallo for the purchase of Claraphi. The wire transfer instructions stated in the memo  
2 field, “RIA Bridge Loan.” The account balance prior to the wire transfer from Victim  
3 B.D. was \$8.47.

4 26. The majority of the \$4 million that was intended for the purchase of  
5 Claraphi was used by Diallo for personal expenses and/or transferred to other bank  
6 accounts held by Diallo, including the following:

7 a. On or about April 12, 2022, Diallo used approximately \$237,000 in  
8 funds from the Tradability Citi 2923 account to purchase a 2021 Rolls-Royce Phantom  
9 automobile from Orange County British Motorcars, LLC in Irvine, California.

10 b. On or about April 26, 2022, Diallo used \$195,000.00 in funds from  
11 the Tradability Citi 2923 account to pre-pay one years’ rent plus a security deposit for  
12 Diallo’s personal residence in Laguna Niguel, California, to Parisian Management Inc. in  
13 Newport Coast, California (i.e., the Defendant \$15,000.00 Held as a Security Deposit).

14 c. On or about June 21, 2022, Diallo used \$170,000 in funds from the  
15 Tradability Citi 2923 account to purchase a 2021 Ferrari SF90ST from BBB Orange  
16 County, LLC, DBA Ferrari & Maserati of Newport Beach in Newport Beach, California.

17 d. On or about July 7, 2022, Diallo used \$12,499 in funds from the  
18 Tradability Citi 2923 account to purchase jewelry at Harry Winston in Costa Mesa,  
19 California, including the defendant Diamond Ring.

20 e. On or about July 13, 2022, Diallo transferred approximately  
21 \$517,500 from the Tradability Citi 2923 account to a Wells Fargo savings account in the  
22 name of Tradability LLC, with Diallo as the sole Signatory (the “Tradability WF 4158”  
23 account). At about the same time, Diallo also opened a checking account at Wells Fargo  
24 in the name of Tradability, LLC with Diallo as the sole signatory (the “Tradability WF  
25 8552” account).

26 f. On or about August 1, 2022, Diallo transferred \$260,000 from the  
27 Tradability WF 4158 account to the Tradability WF 8552 account. The account balance  
28 in the Tradability WF 8552 account prior to the transfer was \$10,000.06.

g. On or about August 1, 2022, Diallo purchased a 2023 Land Rover Range Rover automobile, with approximately \$230,215.24 in funds from the Tradability WF 8552 account from Anaheim Hills Jaguar Land Rover in Anaheim, California (i.e., the Defendant One 2023 Land Rover Range Rover and the Defendant Miscellaneous Land Rover Range Rover Vehicle Accessories).

27. Throughout the period of January to August 2022, nearly all the funds deposited into the Citibank and Wells Fargo Tradability accounts that were used to purchase the Defendant Property are traceable to the deposits from Sundance and victim B.D. Furthermore, Diallo used the victim's funds on personal medical expenses, furniture, and lease payments made on the Rolls Royce Phantom and the Ferrari.

#### FIRST CLAIM FOR RELIEF

28. Based on the facts set forth above, plaintiff alleges that the Defendant Property constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 1343 (wire fraud), which is a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1). The Defendant Property is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

#### SECOND CLAIM FOR RELIEF

29. Based on the facts set forth above, plaintiff alleges that the Defendant Property constitutes property involved in multiple transactions or attempted transactions in violation of 18 U.S.C. § 1956(a)(1)(A)(i) or (a)(1)(B)(i), or property traceable to such property, with the specified unlawful activity being violations of 18 U.S.C. § 1343. The Defendant Property is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

WHEREFORE, plaintiff United States of America prays:

- (a) that due process issue to enforce the forfeiture of the Defendant Property;
- (b) that due notice be given to all interested parties to appear and show cause why forfeiture should not be decreed;

///

1 (c) that this Court decree forfeiture of the Defendant Property to the United  
2 States of America for disposition according to law; and

3 (d) for such other and further relief as this Court may deem just and proper,  
4 together with the costs and disbursements of this action.

5 Dated: November 9, 2023

E. MARTIN ESTRADA  
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Assistant United States Attorney  
Chief, Criminal Division  
JONATHAN GALATZAN  
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9  
10 /s/ Tara B. Vavere  
TARA B. VAVERE  
Assistant United States Attorney  
Asset Forfeiture and Recovery Section

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**VERIFICATION**

I, Julie Sawyer, hereby declare that:

1. I am a Special Agent with the Federal Bureau of Investigation and the case agent for the forfeiture matter entitled *United States of America v. One 2023 Land Rover Range Rover SUV, Miscellaneous Land Rover Range Rover Vehicle Accessories, One Diamond Ring, 1.5 Million Shares of Sundance Strategies, Inc. stock and \$15,000.00 Held as a Security Deposit*.

2. I have read the above Verified Complaint for Forfeiture and know its contents. It is based upon my own personal knowledge and reports provided to me by other law enforcement agents.

3. Everything contained in the Complaint is true and correct, to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 9, 2023 in Santa Ana, California.

  
\_\_\_\_\_  
JULIE SAWYER